



STATE OF IDAHO
DEPARTMENT OF
ENVIRONMENTAL QUALITY

1410 North Hilton • Boise, Idaho 83706-1255 • (208) 373-0502

Dirk Kempthorne, Governor
C. Stephen Allred, Director

CERTIFIED MAIL #7000 1530 0005 5348 5110

April 26, 2002

Mr. Ken Allen
Environmental Coordinator
Interstate Brands Corp.
380 N. Five Mile Road
Boise, ID 83713

RE: T2-010019, Interstate Brands Corp., (Eddy's Bakery), Boise, Idaho
Final Tier II Operating Permit No. 001-00187

Dear Mr. Allen:

The Idaho Department of Environmental Quality (Department) is issuing Tier II Operating Permit No. 001-00187 for Interstate Brands Corp. (Eddy's Bakery) in accordance with IDAPA 58.01.01.400 through 406, *Rules for the Control of Air Pollution in Idaho (Rules)*. This Tier II permit is effective immediately.

The enclosed permit is based on the information contained in your application and on the relevant comments received during the public comment period. Modification to and/or renewal of this Tier II permit shall be requested in a timely manner in accordance with the *Rules*.

Matt Stoll of the Boise Regional Office will contact you regarding a meeting with the Department to discuss the permit terms and requirements. In addition to your facility's plant manager, the Department recommends the following representatives attend the meeting: your responsible official, environmental contact, and any operations staff responsible for day-to-day compliance with permit conditions.

You, as well as any other entity, may have the right to appeal this final agency action pursuant to IDAPA 58.01.23 (*Rules of Administrative Procedure Before the Board of Environmental Quality*). A petition may be filed with the Hearings Coordinator, Department of Environmental Quality, 1410 N. Hilton, Boise, ID 83706-1255, within 35 days of the date of this decision. However, prior to filing a petition for a contested case, the Department encourages you to contact Mike Simon at (208) 373-0502 to address any concerns you may have with the enclosed permit.

Sincerely,


Katherine B. Kelly
Administrator
Air Quality Division

KK/bh G:\AIR PERMITS\T2\INTERSTATE BRANDS (EDDY'S)\FINAL\T2-010019 FINAL PERMIT LTR.DOC

Enclosure

cc: Matt Stoll, Boise Regional Office
Laurie Kral, EPA Region 10



**Air Quality
TIER II OPERATING PERMIT**

State of Idaho
Department of Environmental Quality

PERMIT NO: 001-00187

AQCR: 64

CLASS: B

SIC: 2051

ZONE: 11

UTM COORDINATE (km): 557.3, 4828.5

1. PERMITTEE

Interstate Brands Corp., Eddy's Bakery

2. PROJECT

Tier II Permit

3. MAILING ADDRESS

380 N. Five Mile Road

CITY

Boise

STATE

ID

ZIP

83713

4. FACILITY CONTACT

Ken Allen

TITLE

Environmental Coordinator

TELEPHONE

208-377-8100

5. RESPONSIBLE OFFICIAL

Larry Jones

TITLE

General Manager

TELEPHONE

208-377-8100

6. EXACT PLANT LOCATION

380 N. Five Mile Road, Boise, Idaho

COUNTY

Ada

7. GENERAL NATURE OF BUSINESS & KINDS OF PRODUCTS

Bakery

8. PERMIT AUTHORITY

This permit is issued according to the *Rules for the Control of Air Pollution in Idaho*, IDAPA 58.01.01.400, and pertains only to emissions of air contaminants regulated by the state of Idaho and to the sources specifically allowed to be operated by this permit.

This permit has been granted on the basis of design information presented in the application and the Idaho Department of Environmental Quality's (Department) technical analysis of the supplied information. Changes in design or equipment that result in any change in the nature or amount of emissions may be considered a modification. Modifications are subject to Department review in accordance with Section 58.01.01.200 of the *Rules for the Control of Air Pollution in Idaho*.


KATHERINE B. KELLY, ADMINISTRATOR, AIR QUALITY DIVISION
DEPARTMENT OF ENVIRONMENTAL QUALITY

DATE ISSUED: April 26, 2002

DATE EXPIRES: April 26, 2007

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LIST OF ACRONYMS

AQCR	Air Quality Control Region
CFR	Code of Federal Regulations
Department	Department of Environmental Quality
EPA	Environmental Protection Agency
IDAPA	A numbering designation for all administrative rules in Idaho promulgated in accordance with the Idaho Administrative Procedures Act
km	kilometer
MMBtu/hr	million British thermal units per hour
SIC	Standard Industrial Classification Code
SIP	State Implementation Plan
T/hr	tons per hour
T/yr	tons per year
VOC	volatile organic compound

AIR QUALITY TIER II OPERATING PERMIT NUMBER: 001-00187

Permittee: Interstate Brands Corp., Eddy's Bakery
Location: Boise, Idaho

Date Issued: April 26, 2002
Date Expires: April 26, 2007

1. TIER II OPERATING PERMIT SCOPE**Purpose**

- 1.1 This Tier II operating permit establishes applicable air quality emission standards for a minor facility.
- 1.2 There are no previous air quality permits issued for this facility.

Regulated Sources

- 1.3 Table 1.1 below lists all sources of emissions that are regulated in this Tier II operating permit.

Table 1.1 EDDY'S BAKERY EMISSIONS SOURCES

Permit Section	Source Description	Emissions Control(s)
3	Readco Tray Bread Oven, 3.54 MMBtu/hr; natural gas-fired Baker Perkins Model 980 Bun Oven, 3.78 MMBtu/hr; natural gas-fired	None
2	Natural gas-fired boiler, Sellers Model 54200, 8.37 MMBtu/hr Natural gas-fired water heater, Ace Buehler, 1.5 MMBtu/hr Flour Unloading to Silos <ul style="list-style-type: none">• Schick pneumatic pump rated at 30 T/hr• 3 Flour silos - 120,000 lb each	None None Bin vent filters

MMBtu/hr - million British thermal units per hour
T/hr - tons per hour
lb - pounds

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2. FACILITY-WIDE CONDITIONS

- 2.1 All reasonable precautions shall be taken to prevent particulate matter from becoming airborne in accordance with IDAPA 58.01.01.650-651.

[IDAPA 58.01.01.650-651, 5/1/94]

Odors

- 2.2 No person shall allow, suffer, cause, or permit the emission of odorous gases, liquids, or solids to the atmosphere in such quantities as to cause air pollution.

[IDAPA 58.01.01.775-776, 5/1/94]

- 2.3 Unless specified elsewhere in this permit, the permittee shall maintain records of all odor complaints received. If the complaint has merit, the permittee shall take appropriate corrective action as expeditiously as practicable. The records shall, at a minimum, include the date each complaint was received and a description of the following: the complaint, the permittee's assessment of the validity of the complaint, any corrective action taken, and the date the corrective action was taken.

[IDAPA 58.01.01.405.01, 5/1/94]

Visible Emissions

- 2.4 No person shall discharge any air pollutant to the atmosphere from any point of emission for a period or periods aggregating more than three minutes in any 60-minute period which has greater than 20% opacity as determined by procedures contained in IDAPA 58.01.01.625. These provisions shall not apply when the presence of uncombined water, nitrogen oxides, and/or chlorine gas are the only reason(s) for the failure of the emission to comply with the requirements of this section.

[IDAPA 58.01.01.625, 5/1/94]

Excess Emissions

- 2.5 The permittee shall comply with the procedures and requirements of IDAPA 58.01.01.130-136 for excess emissions due to startup, shutdown, scheduled maintenance, safety measures, upsets, and breakdowns.

Reports and Certifications

- 2.6 Any reporting required by this permit, including, but not limited to, records, monitoring data, supporting information, requests for confidential treatment, testing reports, or compliance certifications, shall contain a certification by a responsible official. The certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document(s) are true, accurate, and complete. Any reporting required by this permit shall be submitted to the following:

Air Quality Permit Compliance
Department of Environmental Quality
Boise Regional Office
1445 N. Orchard
Boise, ID 83706-2239

[IDAPA 58.01.01.405.01, 5/1/94]

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Fuel-burning Equipment

- 2.7 The permittee shall not discharge particulate matter to the atmosphere from any fuel-burning equipment in excess of 0.015 grains per dry standard cubic foot of effluent gas corrected to 3% oxygen by volume for natural gas.

[IDAPA 58.01.01.677, 5/1/94]

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3. BREAD AND BUN OVENS

3.1 Process Description

This process consists of a 3.54 million British thermal unit per hour (MMBtu/hr) Readco Tray bread oven and a 3.78 MMBtu/hr Perkins bun oven. Both ovens are fired by natural gas fuel.

3.2 Control Description

Emissions from the baking ovens are uncontrolled.

Emissions Limits

3.3 Emissions Limits

Volatile organic compound (VOC) emissions from both ovens combined shall not exceed 67.1 tons per year (T/yr) in any 12-month period as determined by the following formula:

$$VOC = \{(0.95) \times (\text{yeast \%}) + (0.195) \times (\text{total ferm.time}) + 1.90\} \times (\text{tons of production})$$

where: VOC is volatile organic compounds emitted in pounds per month
(yeast %) is the highest yeast percentage in bread product
(total ferm.time) is the total fermentation time of the bread in hours per batch
(tons of production) is tons of baked bread per month

[IDAPA 58.01.01.403, 5/1/94]

Monitoring and Recordkeeping Requirements

3.4 Calculation of Emissions

Each month the permittee shall calculate and record the monthly VOC emissions in pounds according to the formula in Permit Condition 3.3 and convert this information into tons per month. Each month, the permittee shall also calculate and record the annual VOC emissions in tons per year by summing the emissions for the previous 12 month period. The permittee shall also maintain records of actual monthly baked bread production, highest yeast percentage for product and the total fermentation time used in the formula to calculate monthly VOC emissions.

[IDAPA 58.01.01.405.01, 5/1/94]

3.5 Maintenance of Records

A compilation of the most recent five years of monitoring records shall be kept onsite and shall be made available to Department representatives upon request.

[IDAPA 58.01.01.405.01, 5/1/94]

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4. TIER II PERMIT GENERAL PROVISIONS

1. All emissions authorized herein shall be consistent with the terms and conditions of this permit. The emission of any pollutant in excess of the limitations specified herein, or noncompliance with any other condition or limitation contained in this permit, shall constitute a violation of this permit, and the *Rules for the Control of Air Pollution in Idaho*, and the Environmental Protection and Health Act, Idaho Code §39-101 et seq.
2. The permittee shall at all times (except as provided in the *Rules for the Control of Air Pollution in Idaho*) maintain and operate in good working order all treatment or control facilities or systems installed or used to achieve compliance with the terms and conditions of this permit and other applicable laws for the control of air pollution.
3. The permittee shall allow the Director, and/or his authorized representative(s), upon the presentation of credentials:
 - 3.1 To enter upon the permittee's premises where an emissions source is located, or in which any records are required to be kept under the terms and conditions of this permit; and
 - 3.2 At reasonable times, to have access to and copy any records required to be kept under the terms and conditions of this permit, to inspect any monitoring methods required in this permit, and to require stack emissions testing (i.e., performance tests) in conformance with state-approved or accepted EPA procedures when deemed appropriate by the Director.
4. Except for data determined to be confidential under Section 9-342A, *Idaho Code*, all reports prepared in accordance with the terms of this permit shall be available for public inspection at the appropriate regional office of the Department of Environmental Quality.
5. Nothing in this permit is intended to relieve or exempt the permittee from compliance with any applicable federal, state, or local law or regulation, except as specifically provided herein.
6. In the event of any change in control or ownership of source(s) from which the authorized emissions emanate, the permittee shall notify the succeeding owner or controller of the existence of this permit by letter, a copy of which shall be forwarded to the Director.
7. This permit shall be renewable on the expiration date, provided the permittee submits any and all information necessary for the Director to determine the amount and type of air pollutants emitted from the equipment for which this permit is granted. Failure to submit such information within 60 days after receipt of the Director's request shall cause the permit to be void.
8. The Director may require the permittee to develop a list of Operation and Maintenance Procedures to be approved by the Department. Such list of procedures shall become a part of this permit by reference, and the permittee shall adhere to all of the operation and maintenance procedures contained therein.
9. Performance tests (i.e., air emissions source tests) conducted pursuant to testing requirements in this permit must be conducted in accordance with IDAPA 58.01.01.157. Such testing shall not be conducted on weekends or state holidays unless the permittee obtains prior Department approval.

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The permittee shall submit a proposed test date for **each** performance test required by this permit to the Department for approval at least 15 days prior to each respective test date (including each test date for periodic tests such as, for example, annual tests). The permittee shall promptly notify the Department of any change in the proposed test date and shall provide at least five workdays advanced notice prior to conducting any rescheduled test, unless the Department approves a shorter notice period.

Within 30 days of the date on which a performance test required by this permit is concluded, the permittee shall submit to the Department a performance test report for the respective test. The performance test report shall include any and all process operating data required to be recorded during the test period as well as the test results, raw test data, and associated documentation.

10. The provisions of this permit are severable, and if any provision of this permit to any circumstance is held invalid, the application of such provision to other circumstances, and the remainder of this permit shall not be affected thereby.